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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

ORIGINAL

In the Matter of the )  
 )  
Implementation of the Pay Telephone )  
Reclassification and Compensation Provisions )  
of the Telecommunications Act of 1996 )  
 )

CC Docket No. 96-128

**COMMENTS**

MCI TELECOMMUNICATIONS CORPORATION

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Its Attorneys

Dated: February 7, 1997

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**COMMENTS**

MCI Telecommunications Corporation (MCI) hereby comments on the comparably efficient interconnection (CEI) plan filed by Southwestern Bell Telephone Company (SWBT) for the provision of payphone service.

SWBT's plan does not explain how it will comply with the Commission's payphone orders concerning the provision of unique payphone coding digits and, therefore, it should be denied. In the Order on Reconsideration, the Commission required local exchange carriers (LECs) to make available to payphone service providers (PSPs) coding digits as a part of automatic number identification (ANI) that specifically identify a phone as a payphone and "not merely a restricted line."<sup>1</sup> The Commission further required payphones to transmit the specific coding digits as a part

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<sup>1</sup> Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Order on Reconsideration, CC Docket No. 96-128, 91-35, FCC 96-439, at para. 64, released November 8, 1996.

of their ANI in order to be eligible for per-call compensation once it becomes effective.<sup>2</sup>

Payphones that do not transmit the specific coding digits as a part of their ANI will not be eligible for per-call compensation.

In its CEI plan, SWBT does not explain how it will provide unique payphone coding digits to all payphone providers in a non-discriminatory manner. Although SWBT states that, at the time per-call compensation becomes effective, customer owned pay telephone service lines will transmit coding digits which will specifically identify them as payphone lines,<sup>3</sup> in its proposed tariff, SWBT states that originating line screening, which will pass a two digit code that identifies the originating lines as a pay telephone, will be available "where appropriate Telephone Company facilities exist."<sup>4</sup> Therefore, it appears that specific payphone coding digits will not be available to all PSPs at all locations.

In addition, LECs, currently, transmit a unique payphone coding digit-- "27"-- as part of ANI for their coin lines as part of access service and at no additional charge to interexchange carriers. The screening digit "07", which is not a unique payphone coding digit and merely indicates a restricted line, is transmitted with ANI for other payphone lines. The provision of coding digits in this manner would be discriminatory because LEC coin lines would be eligible for compensation, however, other payphone lines would not be eligible. Accordingly, the Commission must require SWBT to amend its CEI plan to demonstrate how it will provide specific payphone coding digits to PSPs for all payphone service as a part of ANI, and on the

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<sup>2</sup> Id.

<sup>3</sup> SWBT CEI Plan Exhibit B at p.1.

<sup>4</sup> SWBT CEI plan, P.S.C. Mo.- No. 35 at Original Sheet 2.01, note (AT) (1).

same terms and conditions as LECs provide "27" today for their coin-lines.

SWBT's plan also does not explain how it will provide payphone coding digits that can be transmitted by PSPs for all access methods and from all locations. For example, LECs do not provide ANI or information digits with feature group B access and from non-equal access areas. Accordingly, PSPs would not be able to transmit specific payphone coding digits from payphones in these circumstances and, therefore, they would not be eligible for compensation. In its CEI plan, SWBT should explain how it will comply with the requirement to make payphone coding digits available for transmission under these circumstances.

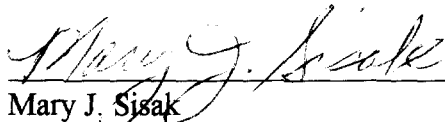
SWBT also does not explain how it will comply with the dialing parity requirement in the payphone order, in which the Commission found that the dialing parity requirements adopted pursuant to Section 251(b)(3) of the 1996 Act, which includes access to operator service, directory assistance, and directory listings, should extend to all payphone location providers. Thus, SWBT's plan is deficient in this regard, also.

Based on the foregoing, MCI respectfully requests that the Commission reject SWBT's CEI plan and require SWBT to refile the plan with the modifications specified herein.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:



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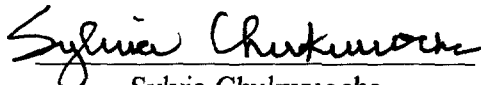
**CERTIFICATE OF SERVICE**

I, Sylvia Chukwuocha, do hereby certify that copies of the foregoing Comments were sent by hand delivery or via first class mail, postage paid to the following on the 7th day of February, 1997.

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